

EXHIBIT D

PROPOSED PRETRIAL SCHEDULE

Date	Event
Monday, September 16, 2019	The Government shall complete its Rule 16(a) disclosures (except expert disclosures). The Government shall remain obligated to produce any Rule 16(a) material it subsequently discovers.
Tuesday, October 15, 2019	All pretrial motions pursuant to Rule 12(b)(3)(A)-(D) are to be filed.
Tuesday, November 12, 2019	Responses to Rule 12(b)(3)(A)-(D) motions due.
Tuesday, November 25, 2019	Replies in support of Rule 12(b)(3)(A)-(D) motions due.
Monday, December 16, 2019	Hearing on Rule 12(b)(3)(A)-(D) motions.
Monday, February 3, 2020	The Government shall complete its disclosure of <i>Jencks</i> materials. The Government shall remain obligated to produce any <i>Jencks</i> materials it subsequently discovers.
Friday, March 6, 2020	The Government shall serve a summary under Rule 16 for each expert witness that it intends to call at trial in its case-in-chief.
Friday, March 6, 2020	The Government shall provide notice of any evidence of other crimes, wrongs or acts which the Government intends to offer under Federal Rule of Evidence 404(b).
Wednesday, April 29, 2020	Each defendant shall serve a summary pursuant to Rule 16 for each expert witness that defendant intends to call at trial in the defendant's case-in-chief.
Friday, May 1, 2020	Each defendant shall complete the defendant's Rule 16 disclosures other than expert disclosures.
Friday, May 1, 2020	The Government shall serve witness and exhibit lists for its case-in-chief. The Government shall identify any statement the Government intends to offer under Federal Rule of Evidence 801(d)(2)(E).
Wednesday, May 13, 2020	The Government shall serve a summary pursuant to Rule 16 for each expert witness that it intends to call at trial in rebuttal to expert testimony offered by any defendant.

Friday, May 15, 2020	Each defendant shall serve witness and exhibit lists for the defendant's case-in-chief.
Friday, May 22, 2020	Motions <i>in limine</i> and motions relating to experts due.
Friday, May 22, 2020	Proposed jury instructions, juror questionnaire, and voir dire questions due.
Monday, June 8, 2020	Responses to motions <i>in limine</i> and motions relating to experts due.
Monday, June 8, 2020	The parties shall file a pretrial conference statement addressing the matters set forth in Local Rule 17.1-1. The Government shall advise the Court that it has produced all <i>Brady</i> and <i>Giglio</i> information in its possession and will continue to produce any the government subsequently discovers.
Monday, June 22, 2020	Replies in support of motions <i>in limine</i> and motions relating to experts due.
Monday, July 13, 2020	Pretrial Conference
Tuesday, July 28, 2020	Jury Selection
Tuesday, August 4, 2020	First Day of Trial